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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

OCT 02 2018

SEAN F. McAVOY, CLERK  
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SPOKANE, WASHINGTON

11 UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF WASHINGTON

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 TAYLOR FERTIG, and  
17 SEAN BUCK,

18 Defendants.

4:18-CR-6031-EFS

SUPERSEDING INDICTMENT

21 U.S.C. §§ 841(a)(1),  
(b)(1)(A)(vi), 846  
Conspiracy to Distribute 400 grams  
or more of Fentanyl (Count 1)

21 U.S.C. § 841(a)(1), (b)(1)(C),  
18 U.S.C. § 2  
Distribution of Fentanyl (Count 2)

21 U.S.C. § 841(a)(1), (b)(1)(A)(vi),  
18 U.S.C. § 2  
Possession with the Intent to  
Distribute 400 Grams or more of  
Fentanyl (Count 3)

21 U.S.C. § 841(a)(1), (b)(1)(C), 18  
U.S.C. § 2  
Possession with the Intent to  
Distribute Heroin (Count 4)

18 U.S.C. § 924(c)(1)(A)  
Possession of a Firearm in  
Furtherance of Drug Trafficking  
(Count 5)

21 U.S.C. § 853  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about January 2017, and continuing until on or about October 2, 2018, in the Eastern District of Washington and elsewhere, the Defendants, TAYLOR FERTIG and SHAWN BUCK, and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense against the United States, to wit: distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), 846.

COUNT 2

On or about April 19, 2018, in the Eastern District of Washington, the Defendant, TAYLOR FERTIG, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-

1 phenylethyl)-4-piperidiny] propanamide (aka Fentanyl), a Schedule II controlled  
2 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C § 2.  
3

4 COUNT 3

5 On or about June 13, 2018, in the Eastern District of Washington, the  
6 Defendant, TAYLOR FERTIG, knowingly and intentionally possessed with intent  
7 to distribute 400 grams or more of a mixture or substance containing a detectable  
8 amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (aka  
9 Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. §  
10 841(a)(1), (b)(1)(A)(vi), and 18 U.S.C. § 2.  
11  
12  
13

14 COUNT 4

15 On or about June 13, 2018, in the Eastern District of Washington, the  
16 Defendant, TAYLOR FERTIG, knowingly and intentionally possessed with intent  
17 to distribute a mixture or substance containing a detectable amount of Heroin, a  
18 Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C),  
19 and 18 U.S.C. § 2.  
20  
21

22 COUNT 5

23 On or about June 13, 2018, in the Eastern District of Washington, the  
24 Defendant, TAYLOR FERTIG, did knowingly and willfully possess firearms, to  
25 wit: a Smith and Wesson, M & P Shield, 9 mm caliber pistol serial number  
26 HUT3180; a Glock Model 19, 9mm caliber pistol serial number ACMT690; a Kel  
27 Tec, Sub-2000, 9mm rifle, bearing serial number F9S35; a Ruger Model LCP, .380  
28

1 auto caliber pistol, serial number 371633615, in furtherance of a drug trafficking  
2 crime for which he may be prosecuted in a court of the United States, that is,  
3  
4 Conspiracy to Distribute 400 grams or more of Fentanyl, in violation of 21 U.S.C.  
5 § 841(a)(1), (b)(1)(A)(vi) as charged in Count 1, all in violation of 18 U.S.C. §  
6 924(c)(1)(A).  
7

8 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

9 The allegations contained in this Superseding Indictment are hereby re-  
10 alleged and incorporated by reference for the purpose of alleging forfeitures.  
11

12 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of  
13 21 U.S.C. § 841, 846, as set forth in this Superseding Indictment, the Defendants,  
14 TAYLOR FERTIG (Counts 1 – 4) and SEAN BUCK (Count 1), shall forfeit to  
15 the United States of America, any property constituting, or derived from, any  
16 proceeds obtained, directly or indirectly, as the result of such offense(s) and any  
17 property used or intended to be used, in any manner or part, to commit or to  
18 facilitate the commission of the offense(s), including, but not limited to:  
19  
20  
21

22 Defendant, TAYLOR FERTIG:

23 U.S. CURRENCY

24 \$12,220.00 U.S. currency, seized on June 13, 2018, by the United  
25 States Drug Enforcement Administration.

26 FIREARMS

27 a Smith and Wesson, M & P9 Shield, 9 mm caliber pistol, bearing serial  
28 number HUT3180;



1 a Glock Model 19, 9mm caliber pistol, bearing serial number ACMT690;  
2 a Kel Tec, Sub-2000, 9mm rifle, bearing serial number F9S35; and,  
3  
4 a Ruger Model LCP, .380 auto caliber pistol, bearing serial number  
5 371633615.

6 If any forfeitable property, as a result of any act or omission of the  
7 Defendant(s):

- 8  
9 (a) cannot be located upon the exercise of due diligence;  
10 (b) has been transferred or sold to, or deposited with, a third party;  
11 (c) has been placed beyond the jurisdiction of the court;  
12 (d) has been substantially diminished in value; or  
13 (e) has been commingled with other property which cannot be divided  
14 without difficulty,  
15

16  
17 the United States of America shall be entitled to forfeiture of substitute property  
18 pursuant to 21 U.S.C. § 853(p).

19  
20 Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of  
21 an offense in violation of 18 U.S.C. § 924 (c)(1)(A) as set forth in Count 5 of this  
22 Indictment, Defendant TAYLOR FERTIG, shall forfeit to the United States of  
23 America, any firearms and ammunition involved or used in the commission of the  
24 offense, including, but not limited to the following:  
25

26  
27 FIREARMS  
28


a Smith and Wesson, M & P9 Shield, 9 mm caliber pistol, bearing serial  
number HUT3180;

1 a Glock Model 19, 9mm caliber pistol, bearing serial number ACMT690;  
2 a Kel Tec, Sub-2000, 9mm rifle, bearing serial number F9S35; and,  
3  
4 a Ruger Model LCP, .380 auto caliber pistol, bearing serial number  
5 371633615.

6 DATED this 2 day of October, 2018.

7 A TRUE BILL /  
8

9  
10 Foreperson  
11

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13 \_\_\_\_\_  
14 Joseph H. Harrington  
15 United States Attorney

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17 \_\_\_\_\_  
18 Stephanie Van Marter  
19 Assistant United States Attorney

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